

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

13 CHASOM BROWN, WILLIAM BYATT,
14 JEREMY DAVIS, CHRISTOPHER
15 CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

V.

GOOGLE LLC

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[GOOGLE'S PROPOSED] ORDER
GRANTING ADMINISTRATIVE MOTION
TO FILE UNDER SEAL**

Judge: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

2 Before the Court is the Joint Submission regarding sealing portions of The Court's
3 September 26, 2022 Order on Plaintiffs' Renewed Request to Depose Sundar Pichai (Dkt. 758).

Having considered the Joint Submission, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
September 26, 2022 Order on Plaintiffs' Renewed Request to Depose Sundar Pichai	GRANTED as to redacted portions at: Pages 5:8-9, 5:13, 5:19, 5:22	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal projects and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

SO ORDERED.

DATED:

THE HONORABLE SUSAN VAN KEULEN
United States Magistrate Judge